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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, SAL
 CATALDO, JULIAN
 SANTIAGO, and SUSAN LYNN
 HARVEY, individually and on behalf of all
 others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,
 Defendant.

Case No.: 3:20-cv-04688-RS

**ADMINISTRATIVE MOTION TO
 CONSIDER WHETHER ANOTHER
 PARTY'S MATERIAL SHOULD BE
 SEALED**

Judge: Hon. Mag. Alex G. Tse
 Date: May 9, 2025
 Time: 2:00 p.m.
 Location: A – 15th Floor

Pursuant to Civil Local Rule 79-5, Plaintiffs respectfully ask the Court to consider whether Google LLC's ("Google") material should be sealed. The material is included within Plaintiffs' Opposition to Google's Motion to Exclude Sundar Pichai from Testifying at Trial.

Document Sought to Be Sealed	Party Claiming Confidentiality	Basis for Sealing
GOOG-RDGZ-00085183 Entirety Attached as Exhibit 1 to the Mao Declaration	Google	Designated "Highly Confidential – Attorneys' Eyes Only" by Google pursuant to the Protective Order
GOOG-RDGZ-00035752 Entirety Attached as Exhibit 2 to the Mao Declaration	Google	Designated "Confidential" by Google pursuant to the Protective Order
GOOG-RDGZ-00164255 Entirety Attached as Exhibit 3 to the Mao Declaration	Google	Designated "Highly Confidential – Attorneys' Eyes Only" by Google pursuant to the Protective Order
GOOG-RDGZ-00018661 Entirety Attached as Exhibit 4 to the Mao Declaration	Google	Designated "Highly Confidential – Attorneys' Eyes Only" by Google pursuant to the Protective Order
Portions of the transcript from the Deposition of David Monsees, taken by Plaintiffs on September 15, 2022 Portions: pages 61–63, 66. Attached as Exhibit 5 to the Mao Declaration	Google	Designated "Highly Confidential – Attorneys' Eyes Only" by Google pursuant to the Protective Order

1	Portions of the transcript from the Deposition of Francis Ma, taken by Plaintiffs on October 28, 2022	Google	Designated “Highly Confidential – Attorneys’ Eyes Only” by Google pursuant to the Protective Order
2	Portions: pages 31, 40–41		
3	Attached as Exhibit 7 to the Mao Declaration		
4	GOOG-RDGZ-00056947	Google	Designated “Highly Confidential – Attorneys’ Eyes Only” by Google pursuant to the Protective Order
5	Entirety		
6	Attached as Exhibit 8 to the Mao Declaration		
7	GOOG-RDGZ-00076980	Google	Designated “Confidential” by Google pursuant to the Protective Order
8	Entirety		
9	Attached as Exhibit 9 to the Mao Declaration		
10	GOOG-RDGZ-00163898	Google	Designated “Highly Confidential – Attorneys’ Eyes Only” by Google pursuant to the Protective Order
11	Entirety		
12	Attached as Exhibit 10 to the Mao Declaration		
13	GOOG-RDGZ-00057867	Google	Designated “Highly Confidential – Attorneys’ Eyes Only” by Google pursuant to the Protective Order
14	Entirety		
15	Attached as Exhibit 11 to the Mao Declaration		
16	GOOG-RDGZ-00060716	Google	Designated “Highly Confidential – Attorneys’ Eyes Only” by Google pursuant to the Protective Order
17	Entirety		
18	Attached as Exhibit 12 to the Mao Declaration		
19	GOOG-RDGZ-00152785	Google	Designated “Confidential” by Google pursuant to the Protective Order
20	Entirety		
21	Attached as Exhibit 13 to the Mao Declaration		
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1	GOOG-RDGZ-00020740	Google	Designated "Confidential" by Google pursuant to the Protective Order
2	Entirety		
3	Attached as Exhibit 14 to the Mao Declaration		
4	GOOG-RDGZ-00116916	Google	Designated "Confidential" by Google pursuant to the Protective Order
5	Entirety		
6	Attached as Exhibit 15 to the Mao Declaration		
7	GOOG-RDGZ-00131086	Google	Designated "Confidential" by Google pursuant to the Protective Order
8	Entirety		
9	Attached as Exhibit 16 to the Mao Declaration		
10	GOOG-RDGZ-00160904	Google	Designated "Confidential" by Google pursuant to the Protective Order
11	Entirety		
12	Attached as Exhibit 17 to the Mao Declaration		
13	GOOG-RDGZ-00145362	Google	Designated "Confidential" by Google pursuant to the Protective Order
14	Entirety		
15	Attached as Exhibit 18 to the Mao Declaration		
16	GOOG-RDGZ-00130078	Google	Designated "Confidential" by Google pursuant to the Protective Order
17	Entirety		
18	Attached as Exhibit 19 to the Mao Declaration		
19	GOOG-RDGZ-00127151	Google	Designated "Confidential" by Google pursuant to the Protective Order
20	Entirety		
21	Attached as Exhibit 20 to the Mao Declaration		
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1	GOOG-RDGZ-00038594	Google	Designated “Confidential” by Google pursuant to the Protective Order
2	Entirety		
3	Attached as Exhibit 21 to the Mao Declaration		
4	GOOG-RDGZ-00171250	Google	Designated “Confidential” by Google pursuant to the Protective Order
5	Entirety		
6	Attached as Exhibit 22 to the Mao Declaration		
7	Google’s Fourth Supplemental Responses to Plaintiffs’ First Set of Interrogatories.	Google	Designated “Highly Confidential – Attorneys’ Eyes Only” by Google pursuant to the Protective Order
8	Entirety		
9	Attached as Exhibit 24 to the Mao Declaration		
10	Portions of the transcript from the Deposition of Eric Miraglia, taken by Plaintiffs on October 25, 2022	Google	Designated “Highly Confidential – Attorneys’ Eyes Only” by Google pursuant to the Protective Order
11	Portions: pages 68–74, 96, 97		
12	Attached as Exhibit 25 to the Mao Declaration		
13	GOOG-RDGZ-00087672	Google	Designated “Confidential” by Google pursuant to the Protective Order
14	Entirety		
15	Attached as Exhibit 26 to the Mao Declaration		
16	GOOG-RDGZ-00177701	Google	Designated “Highly Confidential – Attorneys’ Eyes Only” by Google pursuant to the Protective Order
17	Entirety		
18	Attached as Exhibit 27 to the Mao Declaration		
19	GOOG-RDGZ-00061531	Google	Designated “Confidential” by Google pursuant to the Protective Order
20	Entirety		
21	Attached as Exhibit 28 to the Mao Declaration		
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1	GOOG-RDGZ-00046121	Google	Designated “Confidential” by Google pursuant to the Protective Order
2	Entirety		
3	Attached as Exhibit 29 to the Mao Declaration		
4	GOOG-RDGZ-00117801	Google	Designated “Confidential” by Google pursuant to the Protective Order
5	Entirety		
6	Attached as Exhibit 30 to the Mao Declaration		
7	GOOG-RDGZ-00127803	Google	Designated “Confidential” by Google pursuant to the Protective Order
8	Entirety		
9	Attached as Exhibit 31 to the Mao Declaration		
10	GOOG-RDGZ-00127840	Google	Designated “Highly Confidential – Attorneys’ Eyes Only” by Google pursuant to the Protective Order
11	Entirety		
12	Attached as Exhibit 32 to the Mao Declaration		
13	GOOG-RDGZ-00188868	Google	Designated “Confidential” by Google pursuant to the Protective Order
14	Entirety		
15	Attached as Exhibit 33 to the Mao Declaration		
16	GOOG-RDGZ-00203483	Google	Designated “Confidential” by Google pursuant to the Protective Order
17	Entirety		
18	Attached as Exhibit 34 to the Mao Declaration		
19	GOOG-RDGZ-00039515	Google	Designated “Confidential” by Google pursuant to the Protective Order
20	Entirety		
21	Attached as Exhibit 35 to the Mao Declaration		
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1	GOOG-RDGZ-00153597	Google	Designated “Highly Confidential – Attorneys’ Eyes Only” by Google pursuant to the Protective Order
2	Entirety		
3	Attached as Exhibit 36 to the Mao Declaration		
4	GOOG-RDGZ-00017489	Google	Designated “Highly Confidential – Attorneys’ Eyes Only” by Google pursuant to the Protective Order
5	Entirety		
6	Attached as Exhibit 37 to the Mao Declaration		
7	GOOG-RDGZ-00186761	Google	Designated “Confidential” by Google pursuant to the Protective Order
8	Entirety		
9	Attached as Exhibit 38 to the Mao Declaration		
10	GOOG-RDGZ-00014597	Google	Designated “Confidential” by Google pursuant to the Protective Order
11	Entirety		
12	Attached as Exhibit 39 to the Mao Declaration		
13	Portions of the transcript from the Deposition of Greg Fair, taken by Plaintiffs on October 3, 2022	Google	Designated “Highly Confidential – Attorneys’ Eyes Only” by Google pursuant to the Protective Order
14	Portions: pages 210–215.		
15	Attached as Exhibit 42 to the Mao Declaration		
16	Portions of the transcript from the Deposition of Sam Heft-Luthy, taken by Plaintiffs on February 8, 2023	Google	Designated “Highly Confidential – Attorneys’ Eyes Only” by Google pursuant to the Protective Order
17	Portions: pages 97–104.		
18	Attached as Exhibit 43 to the Mao Declaration		
19	GOOG-RDGZ-00158221	Google	Designated “Highly Confidential – Attorneys’ Eyes Only” by Google pursuant to the Protective Order
20	Entirety		
21	Attached as Exhibit 44 to the Mao Declaration		
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Pursuant to Civil Local Rule 79-5(f), Google, as the Designating Party, bears the responsibility to establish that its designated material is sealable.

Dated: April 17, 2025

By /s/ Mark C. Mao

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